

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Application Review

Issue Date:

Region: Asheville Regional Office
County: Burke
NC Facility ID: 1200141
Inspector's Name: Patrick Ballard
Date of Last Inspection: 05/17/2016
Compliance Code: 3 / Compliance - inspection

Facility Data	Permit Applicability (this application only)
Applicant (Facility's Name): Bimbo Bakeries USA, Inc. - Valdese Facility Address: Bimbo Bakeries USA, Inc. - Valdese 320 East Main Street Valdese, NC 28690 SIC: 2051 / Bread Cake And Related Product NAICS: 311812 / Commercial Bakeries Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V	SIP: 15A NCAC 02Q .0317 of 02D .0530, and 02Q .0513 (renewal) NSPS: NA NESHAP: NA PSD: NA PSD Avoidance: VOCs (02Q .0317) NC Toxics: NA 112(r): NA Other: NA

Contact Data			Application Data
Facility Contact	Authorized Contact	Technical Contact	
Lkeithia Boles Quality and Food Safety Manager (828) 874-2136 320 East Main Street Valdese, NC 28690	Xochitl Gross Plant Manager (828) 874-2136 320 East Main Street Valdese, NC 28690	Lkeithia Boles Quality and Food Safety Manager (828) 874-2136 320 East Main Street Valdese, NC 28690	Application Number: 1200141.16A Date Received: 08/31/2016 Application Type: Renewal with modification Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 09315/T04 Existing Permit Issue Date: 03/20/2014 Existing Permit Expiration Date: 05/31/2017

Total Actual emissions in TONS/YEAR:

CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2015	0.0200	3.48	156.15	2.93	3.52	0.0628	0.0626 [Hexane, n-]
2014	0.0300	4.10	202.18	3.44	4.40	0.9468	0.8729 [Methanol (methyl alcohol)]
2013	0.0300	3.80	197.84	3.20	3.92	0.9851	0.9165 [Methanol (methyl alcohol)]
2012	0.0200	3.28	107.01	2.75	3.40	1.13	1.06 [Methanol (methyl alcohol)]
2011	0.0100	2.84	105.88	2.40	3.18	0.9288	0.8736 [Methanol (methyl alcohol)]

Review Engineer: Lori Ann Phillips Review Engineer's Signature: _____ Date: _____	Comments / Recommendations: Issue: 09315/T05 Permit Issue Date: _____ Permit Expiration Date: _____
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1. Purpose of Application:

Bimbo Bakeries USA, Inc. (BBU) has submitted a permit renewal/modification application. The application was received at DAQ-RCO on September 7, 2016. The facility is located at 320 East Main Street in Valdese, Burke County. In addition to the renewal, BBU requests the removal of one previously permitted source, the reintroduction of four insignificant sources that were inadvertently left out of the previous permit, and the addition of a PSD avoidance condition for VOCs (significant permit modification). The facility is currently operating under permit No. 09315T04 which expires on May 31, 2017.

2. Facility Description:

BBU is a commercial bakery with four permitted direct-fired natural gas baking ovens for various products. One of the baking lines, ES-3, was removed from the facility in November 2009 and shall be removed from the permit during this renewal/modification. Of the remaining three baking lines, two are bread lines (one white bread and one mixed varieties) and one roll (bun) line. Additionally, the facility operates flour storage silos with internally venting bagfilters and other miscellaneous insignificant activities. BBU operates three shifts per day for each line, with a shutdown (including one to three days downtime) each week. Production is somewhat seasonal, with summers and snow forecasts being the heaviest production periods.

3. Application Chronology:

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| September 7, 2016 | Received permit renewal application at RCO. Application included all necessary forms and authorized signature for renewal. No fee was required at this time. |
| September 7, 2016 | Sent acknowledgement letter to Ms. Xochitl Gross, Plant Manager. |
| December 1, 2016 | Noticed a request to add PSD Avoidance for VOCs in the cover letter and emailed L'Keithia Boles, Quality and Food Safety Manager (Permit Contact) for clarification. The facility contact responded and would like to proceed with adding a PSD avoidance condition to the permit for VOCs. This makes the permit application a modification in addition to the renewal. A fee of \$922 is required. |
| December 9, 2016 | Emailed L'Keithia Boles to find out when the modification fee would arrive at RCO. |
| January 4, 2017 | Emailed L'Keithia Boles to find out when the modification fee would arrive at RCO. |
| January 10, 2017 | Received check for \$922. |

4. New Equipment/Changes in Emissions and Regulatory Review:

BBU has submitted a permit renewal/modification application. The facility has requested the removal of an existing permitted source, the addition of four insignificant sources, and a PSD avoidance condition for VOCs as discussed below.

Equipment Changes:

BBU has requested the removal of ES-3 (one direct natural gas-fired variety roll oven (3.50 million Btu per hour maximum heat input capacity) from the permit. According to the most recent inspection report for the facility conducted on May 2016, ES-3 was removed from the facility in November of 2009. This emission source shall be removed from the permit.

BBU requests the addition of four insignificant natural gas-fired air make-up units that were inadvertently left out of the previous permit. These units are heating units that provide comfort heat for facility workers. According to the permit review for T03 written by Mark Cuilla dated June 29, 2012, these units had been found in the ESM module in IBEAM listed at IS-9 and were deleted from ESM at that time. It appears that they were inadvertently deleted and should have been added to the insignificant source list. Therefore, these sources will be added back to the insignificant source list as IS-9.

Change in Emissions:

There are no changes in emissions associated with this renewal/modification application.

Regulatory Review:

While preparing the permit renewal application, BBU calculated PTE for VOCs and realized that the facility-wide PTE was approximately 442 tons per year, which is greater than the PSD emission limit of 250 tons per year. As such, BBU is requesting that a PSD Avoidance condition for VOCs be placed into the permit. It should be noted that the facility-wide actual VOC emissions have not exceeded 250 tons in any of the reported annual air emissions inventories. Therefore, the permit stipulation for PSD Avoidance, 15A NCAC 02Q .0317, shall be added to the permit. The facility will be required to calculate and record VOC emissions at the end of each month. Semi-annual reporting of VOC emissions shall also be required.

5. Changes to Permit:

- Removed ES-3 from the permit at the request of the facility.
- Added IS-9 (four natural gas-fired air make-up units, 2.63 MMBtu/hr each) to the Insignificant Activities List.
- Added 15A NCAC 02Q .0317 (PSD Avoidance) to the permit.

6. NSPS, NESHAPS, MACT, PSD, and Attainment Status:

This facility is not subject to any NSPS or NESHAPS requirements and is a PSD minor source located in Burke County, which is in attainment for all criteria pollutants.

7. Facility Wide Air Toxics:

This facility does not currently emit any air toxics at levels greater than the NC TPERs. Air toxics from the combustion of natural gas in the ovens, insignificant boilers, and insignificant air make-up units are minimal, as were reported in the annual air emissions inventories. No unacceptable risk to human health is suggested. No further air toxics evaluation is required at this time.

8. Compliance Status:

The facility was in compliance during the most recent inspection conducted on May 17, 2016 by Patrick Ballard.

9. Facility Emissions Review:

The emissions summary in the table below is based on the emissions summary submitted by the BBU in the permit application.

Facility Emissions Summary

Pollutant	Title V Emissions (tpy)	Permit Potential Emissions (tpy)	2015 Actual Emissions (tpy)
TSP	8.08	8.08	3.52
PM-10	8.08	8.08	3.52
PM-2.5	8.08	8.08	3.52
SO₂	0.13	0.13	0.02
NO_x	20.88	20.88	3.48
VOC	441.8	245	156.16
CO	17.54	17.54	2.93

Based on the emissions summary, this facility is correctly classified as a Title V.

10. Other Considerations:

- A P.E. seal is NOT required for this application.
- A zoning consistency determination is NOT required for this application.
- This facility is not subject to the 112(r) program as it does not store any of the listed chemicals in quantities above the program thresholds.

11. Public Notice Review:

A 30-day public notice and 45-day EPA review period is required for this permit renewal/modification.

The 30-day public notice period was from XX through XX.

The EPA 45-day review period was from XX through XX.

12. Conclusions, Comments, and Recommendations:

This air permit application for the Bimbo Bakeries USA, Inc, located at 320 East Main Street in Valdese, Burke County, NC, has been reviewed by DAQ to determine compliance with all procedures and requirements. The Asheville Regional Office has made comments on the draft permit. Continued compliance with this air permit is expected. Recommend issuance of revised air permit No. 09315T05.